

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION
BUREAU, et al.

Plaintiffs,

vs.

STRATFS, LLC (f/k/a STRATEGIC
FINANCIAL SOLUTIONS, LLC), et al.

Defendants, and

STRATEGIC ESOP, et al.,

Relief Defendants.

Case No. 1:24-cv-00040-EAW-MJR

**[PROPOSED] ORDER HOLDING FIDELIS LEGAL SUPPORT SERVICES, LLC
AND CAMERON CHRISTO IN CIVIL CONTEMPT AND OTHER RELIEF**

WHEREAS, having considered the Receiver's Motion for an Order to Show Cause Why Receivership Defendant Fidelis Legal Support Services, LLC and Relief Defendant Cameron Christo Should Not Be Held in Civil Contempt, the Declaration of Alexander D. Wall, Receivership Defendant Fidelis Legal Support Services, LLC and Relief Defendant Cameron Christo's opposition, the Receiver's reply, as well as the related submissions of the parties and the Receiver in connection with Fidelis's Motion Challenging the Receiver's Determination that Fidelis is a Receivership Defendant (Dkt. No. 190, the "Fidelis Motion") and the Receiver's Emergency Motion for an Order to Show Cause Why Receivership Defendant Lit Def Strategies, LLC and Individual Defendant Jason Blust Should Not Be Held in Civil Contempt (Dkt. No. 179, the "Blust Contempt Motion"), and having considered the pertinent evidence before the Court, the Court finds good cause, and so,

IT IS HEREBY ORDERED that Fidelis Legal Support Services, LLC (“Fidelis”) and Cameron Christo (“Christo”) are held in civil contempt of the Temporary Restraining Order (Dkt. No. 12, “TRO”) and Preliminary Injunction (Dkt. No. 184, “PI”);

IT IS HEREBY ORDERED that Fidelis and Christo shall cooperate immediately and completely with the Receiver by turning over to the Receiver all Assets and corporate records of Fidelis and the Bush Lake Trust, turning over control of all business operations of Fidelis to the Receiver (so he can determine which operations can continue to be operated lawfully and profitably), and providing a complete financial accounting of Fidelis and Bush Lake Trust, disclosing all financial transactions by Fidelis and Bush Lake Trust, including all transfers to or from third parties;

IT IS HEREBY ORDERED that Christo, individually, shall be fined \$1,000 per day for every day of noncompliance;

IT IS HEREBY ORDERED that Christo and Fidelis are individually and jointly responsible along with Jason Blust for all fees and costs incurred by the Receiver in connection with the Fidelis Motion (Dkt. No. 190), and that the Receiver shall be permitted to submit a statement of his fees and costs in connection with the Fidelis Motion to Fidelis and Christo for payment; and

IT IS HEREBY ORDERED that Christo and Fidelis are individually and jointly responsible along with Jason Blust for all fees and costs incurred by the Receiver in connection with the Blust Contempt Motion (Dkt. No. 179), and that the Receiver shall be permitted to

submit a statement of his fees and costs in connection with the Blust Contempt Motion to Fidelis and Christo for payment.

IT IS SO ORDERED, this ____ day of _____, 2025.

HONORABLE ELIZABETH A. WOLFORD
UNITED STATES DISTRICT JUDGE